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OCT - 2 2018

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
_____ DIVISION

BY MAIL

Obed Brown)

6145 Calite)

St. Louis, MO 63136)

(Enter above the full name of the Plaintiff[s]
in this action.))

- vs -)

Barnes-Jewish Hospital)

Trillo Alvarez, Ludwig MD)

Shawgi Silver, MD)

(Enter above the full name of ALL Defendant[s] in this action. Fed. R. Civ. P. 10(a) requires that the caption of the complaint include the names of **all** the parties. Merely listing one party and "et al." is insufficient. Please attach additional sheets if necessary.)

Case No. _____
(To be assigned by Clerk
of District Court)

COMPLAINT

- I. State the grounds for filing this case in Federal Court (include federal statutes and/or U.S. Constitutional provisions, if you know them):

Medical Battery and civil rights violations.

II. Plaintiff, Gbeol Brown resides at

6445 Lallite, St. Louis, St. Louis,
street address city county

MO, 63136, 314-388-3339
state zip code telephone number

(if more than one plaintiff, provide the same information for each plaintiff below)

Barnes-Jewish Hospital

III. Defendant, _____ lives at, or its business is located at

4901 Forest Park Ave., Ste. 1140
MS 90-75-573, St. Louis, St. Louis,
street address city county

Missouri, 63108.
state zip code

(if more than one defendant, provide the same information for each defendant below)

Address:

Barnes-Jewish Hospital
Legal Department
4901 Forest Park Ave.
Ste. 1140
MS 90-75-573
St. Louis, MO 63108

- IV. Statement of claim (State as briefly as possible the facts of your case. Describe how each defendant is involved. You must state exactly what each defendant personally did, or failed to do, which resulted in harm to you. Include also the names of other persons involved, dates, and places. Be as specific as possible. You may use additional paper if necessary):

See attachment for explanation...

V. Relief: State briefly and exactly what you want the Court to do for you.

I'm requesting punitive damages
in the amount of \$500,000 - \$50,000,000
based off a Jury ~~trial~~ Trial; verdict.

VI. MONEY DAMAGES:

A) Do you claim either actual or punitive monetary damages for the acts alleged in this complaint?

YES

☒

NO

☐

B) If your answer to "A" is YES, state below the amount claimed and the reason or reasons you believe you are entitled to recover such money damages:

\$500,000 - \$50,000,000

medical malpractice and deprivation of
civil rights under color of law; race/color discrimination

VII. Do you maintain that the wrongs alleged in the complaint are continuing to occur at the present time?

YES

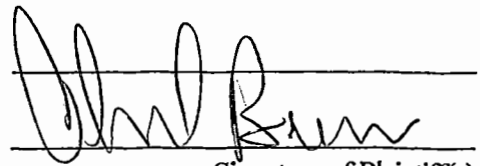
☒

NO

☐

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 01 day of October, 2018



Signature of Plaintiff(s)

Pro Se Litigant Proceeding in Forma Pauperis

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OBED BROWN,

Plaintiff,

v.

JURY TRAIL DEMANDED

Barnes-Jewish Hospital

Defendant

September 30th, 2018

Federal Lawsuit for Medical Battery & Civil Rights Violations:

I am Trans-sexual woman Obed Brown of African-American decent. On January 26th, 2018, Trillo Alvarez, Ludwig MD and Shawgi Silver, MD violated my civil rights when both medical professionals held me captive (under arrest) against my free will. I don't have a criminal record or any prior convictions. My 13th amendment right was violated; **false imprisonment/involuntary servitude/human trafficking 18 U.S.C. § 1581 & assault with substance abuse by forcing me to take sedative-hypnotic prescription drugs under duress, coercion & intimidation** which put me in fear for my life. The doctors performed those duties based off a medical affidavit application that was falsified by Sgt. Sally Panzer of the St. Louis police with several fraudulent medical diagnosis & was unsupported, lacking probable cause for her allegations involving my social media account that was hacked 3-4 times. Sally Panzer conspired against my civil rights with MD Trillo & Silver, after she coerced probate judge Michael Mullen to sign the application for a 96-hour hold, which turned into almost a 22-day hold without the proper due process. I was transported to a police facility & had my privacy violated several times **without** any of the officers reading me my Miranda Rights. I have a pending federal case against my former job Express Scripts, which the judge upheld my claims of sex discrimination/retaliation. I refused to sign authorization forms for my medical records in the discovery request so the company committed civil/criminal conspiracy with the police because there was no medical necessity to invade my privacy under the 4th & 5th amendment to the United States Constitution. That's why Sally Panzer did the medical necessity fraudulently. MD Trillo Alvarez, Ludwig, Shawgi, Silver, MD & their medical teams questioned me aggressively, even after I chose to remain silent under the 5th amendment.

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The affidavit was involuntary without probable cause or evidence & yet Trillo Alvarez, Ludwig fraudulently diagnosed me with Psychosis; an unspecified psychotic disorder. Symptoms of Unspecified Psychotic Disorder are common signs of:

- delusions may be one sign of an unspecified psychotic disorder that point to a problem with mental illness.
- Poor personal hygiene and anti-social behavior are some other symptoms that a person may have problems with a psychotic disorder.

Keep in mind that during the time of my containment at Barnes-Jewish Hospital, I was homeless when the police capture me due to my wrongful termination at Express Scripts. I had to protest under the 1st amendment & investigate independently because I'm a Pro Se Litigant.

On January 31st, 2018 the hospital held a social media hearing, on video Skype, which violated every federal due process right I have in the constitution. While at the hospital I was forced to stay an additional 21 days because I remained silent & refused medical treatment from unvetted medical professionals.

I'm a victim of medical battery. **Medical battery** - is the **intentional violation** of a patient's **right to direct their own medical treatments**; located in the 14th amendment. Doctors must obtain a patient's informed consent when rendering non-emergency treatment. If medical treatment is performed without the patient's consent or against their will, the patient may have a claim for medical battery, even if the doctor did not intend to cause any harm.

I was fraudulently diagnosed with Psychosis by, MD Trillo Alvarez, Ludwig. Then involuntarily forced to take **RISPERIDONE & WARFARIN** without my consent. Since the hospital placed me in the psych ward, I witnessed abusive behavior rendered on the other patients who refused to take the medications. Those patients were tied down with chains & handcuffed naked like slaves; then shot with a needle & thrown into a padded room for about a hour. It was a torturous experience. **I felt like a victim of the Holocaust in Nazi Germany while being experimented on by medical & legal professionals.** Most were African-American patients as well. When I refused all medical treatment under the 14th amendment, the doctor threatened to shoot me with a needle involuntarily, even though I was behaving professionally.

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HARMFUL SIDE EFFECTS OF RISPERIDONE & WARFARIN (COUMADIN) that TRILLO ALVAREZ, LUDWIG, SHAWGI SILVER, MD and BARNES-JEWISH HOSPITAL prescribed to Trans-Sexual Woman OBED BROWN INVOLUNTARILY.

RISPERIDONE: extrapyramidal effects (sudden, often jerky, involuntary motions of the head, neck, arms, body, or eyes), dizziness, tiredness, drowsiness, fatigue, fever, weight gain, feeling hot or cold, headache, dry mouth, increased appetite, restlessness, anxiety, sleep problems (insomnia), nausea, vomiting, stomach pain, constipation, cough, sore throat, runny or stuffy nose, or skin rash.

WARFARIN (COUMADIN): Severe bleeding, including heavier than normal menstrual bleeding, Red or brown urine, black or bloody stool, severe headache or stomach pain, joint pain, discomfort or swelling, especially after an injury, vomiting of blood or material that looks like coffee grounds, coughing up blood, bruising that develops without an injury you remember, dizziness or weakness, vision changes

CONCLUSION

I, Ms. Obed Brown, am filing charges of medical battery and civil rights violations against Trillo Alvarez, Ludwig, MD, Shawgi Silver, MD & Barnes Jewish Hospital (as separate entities). The hospital tried to force/coerce me to sign up for a Medicaid Insurance program without my consent. The hospital billed me for an involuntary stay & tried to force me into Medicaid for disability. I refused under the 14th amendment. Also, the medical case wasn't closed properly because Sgt. Sally Panzer didn't do a "return of service request" to the Probate office, which is what closes the original application. The affidavit was only valid for 10 days, not 21 days, like the hospital tried to hold me for. The case is technically still illegally opened because it wasn't closed properly.

After I was discharged from the hospital on an involuntary stay, based off the falsified medical affidavit application from Sgt. Sally Panzer; I had a second opinion. The second opinion happened on March 4th of 2018,

A separate team of medical professionals from a different source reported in medical notes, that I, Obed Brown, had no signs of Schizophrenia, Bipolar Disorder or Psychosis. (*See Exhibits attached*) Which leads me to believe that Sgt. Sally Panzer, Barnes-Jewish Hospital,

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Trillo Alvarez, Ludwig & Shawgi, Silver participated in a civil conspiracy involving medical battery/malpractice & deprived me of my civil rights under color of law because my former employer (which is the largest pharmaceutical company in the world) doesn't have a medical necessity to invade my privacy or justify their reasoning for sex discrimination/ retaliation in federal court.

At this time, I'm seeking **punitive damages** in the amount of **\$500,000 - \$50,000,000** for **medical battery/malpractice, assault, intentional torture (tort crime law), fraud, privacy invasion (HIPPA & GINA) & obstruction of justice for participating in an organized police entrapment operation.**

List of U.S.C. Federal Charges & Civil Rights Violations against Defendant:

1610. ASSAULT -- 18 U.S.C. 351(e) including Medical Battery and Malpractice

Absent a statutory definition of assault, the courts have looked to the common law and have concluded that an "**assault**" is: An attempt with **force or violence to do a corporal injury** to another; may consist of any act tending to such corporal injury, accompanied with such circumstances as denotes at the time an intention, coupled with present ability, of using actual violence against the person.

- **Human Trafficking/False Imprisonment/Peonage: 18 U.S.C. § 1581**
- **Miranda Rights Violation: 18 U.S. Code § 3501 - Admissibility of confessions**
I, Ms. Obed Brown, was never read my Miranda Rights.
- **Assault/Medical Battery/Duress; Assault with a sedative-hypnotic, abusive substance: including threats, violence, constraints, or other action brought to bear on someone to do something against their will or better judgment: 1610. Assault -- 18 U.S.C. 351(e) (forced to take Risperidone and Warfarin involuntarily under Duress)**
- **Fraud/Forgery: Missouri statute Title XXVI TRADE AND COMMERCE Chapter 400; 400.5-109.**
- **Searches/Seizures: Title IX u.s.c. 9-111.000 - Forfeiture/Seizure 288.395.**

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- **HIPPA: Health Insurance Portability and Accountability Act of 1996; 42 U.S.C. § 1320d**
- **GINA: 42 U.S. Code § 2000ff-5**
- **Malpractice/ Medical error: 22 U.S. Code § 2702 - Malpractice protection**
- **Medical Records & Billing (billing): Missouri statute Title XXVI TRADE AND COMMERCE Chapter 400; 400.5-109.**
- **Fair credit report violation under federal law; regulating the procedures for conducting and using background checks on internal and external patients: 15 U.S.C. § 1681**

Title VII of the Civil Rights Act of 1964

42 u.s.c. 2000a-e. Title VII prohibits employment discrimination based on **race, color, religion, sex and national origin**.

18 U.S. Code § 242 - Deprivation of rights under color of law

Section 242 of Title 18 makes it a crime for a person acting under color of any law to willfully deprive a person of a right or privilege protected by the Constitution or laws of the United States.

For the purpose of Section 242, acts under "color of law" include acts not only done by federal, state, or local officials within their lawful authority, but also acts done beyond the bounds of that official's lawful authority, if the acts are done while the official is purporting to or pretending to act in the performance of his/her official duties. Persons acting under color of law within the meaning of this statute include **police officers, prisons guards and other law enforcement officials, as well as judges, care providers in public health facilities, and others who are acting as public officials.**

Whoever, under color of any law, statute, ordinance, regulation, or custom, willfully subjects any person in any State, Territory, Commonwealth, Possession, or District to the deprivation of any

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rights, privileges, or immunities secured or protected by the Constitution or laws of the United States, ... shall be fined under this title or imprisoned not more than one year, or both and if death results from the acts committed in violation of this section or if such acts include kidnaping or an attempt to kidnap, aggravated sexual abuse, or an attempt to commit aggravated sexual abuse, or an attempt to kill, shall be fined under this title, or imprisoned for any term of years or for life, or both, or may be sentenced to death.

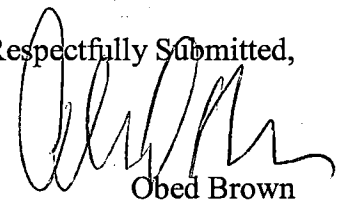
18 U.S. Code § 1519 - Destruction, alteration, or falsification of records in Federal investigations and bankruptcy

Whoever knowingly alters, destroys, mutilates, conceals, covers up, falsifies, or makes a false entry in any record, document, or tangible object with the intent to impede, obstruct, or influence the investigation or proper administration of any matter within the jurisdiction of any department or agency of the United States or any case filed under title 11, or in relation to or contemplation of any such matter or case, shall be fined under this title, imprisoned not more than 20 years, or both.

TITLE 18, U.S.C., SECTION 241- Conspiracy Against Rights

If two or more persons conspire to injure, oppress, threaten, or intimidate any person in any State, Territory, Commonwealth, Possession, or District in the free exercise or enjoyment of any right or privilege secured to him by the Constitution or laws of the United States, or because of his having so exercised the same;

Respectfully Submitted,



Obed Brown

Pro Se Litigant/ Private Attorney General

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CERTIFICATE OF SERVICE

The undersigned certifies that on September 30th, 2018, a true copy of the foregoing was served via electronic mail and first class mail, postage prepaid, to the following:

Barnes-Jewish Hospital
4901 Forest Park Ave.
Ste. 1140
MS90-75-573

St. Louis, Missouri 63108

Attorney for Defendant



Obed Brown

Pro Se Litigant/Plaintiff



Plaintiff - Transgender woman
Ms. Obeed Brown

for you to serve and a copy for your own records. In the alternative, you may request that the defendant(s) waive service. Instructions and forms for requesting the waiver of service are available from Clerk's Office (Note: If a defendant fails to waive service, you will still be responsible for serving upon them a copy of the complaint and a summons).

If you are financially unable to pay the filing fee, you may request the court to file your action without prepayment of costs. (One whose complaint is filed without the payment of the filing fee is said to proceed in forma pauperis). Applications to proceed without prepayment of costs and financial affidavits are available from the Clerk's Office. (NOTE: Each plaintiff named in your complaint must submit a separate application if the complaint is to be filed in forma pauperis). If you proceed in forma pauperis the United States Marshal's Service will serve a copy of your complaint upon each defendant, however, you are responsible for providing the Court the correct address of each defendant.

APPOINTMENT OF COUNSEL

A pro se litigant does not have an absolute right to a court-appointed attorney. The court may, in its discretion, appoint an attorney to represent you. Form motions for appointment of counsel are available from the Clerk's Office upon request.

SUBSEQUENT FILINGS

Certificate of Service	
I hereby certify that a copy of the foregoing was mailed	
to <u>Barnes-Jewish Hosp. Bldg</u>	<u>4901 Forest Park Ave, Ste. 1140</u>
[Opposing Party or Counsel]	[Address] <u>MS 90-15-573</u>
on <u>10/01</u> , 20 <u>18</u>	<u>St. Louis, MO 63108</u>
[Date]	[Your Signature]

Certificate of Service

To file a motion, pleading or other paper, you must submit the original document to the Court Clerk. The original document must include a certificate of service which should be in the following form:

Any pleading or document received by the court that fails to include a certificate of service may be returned. In addition to filing the original document with the court, you must mail a